

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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|-------------------------|---|---------------------|
| _____ |) | |
| SECURITIES AND EXCHANGE |) | |
| COMMISSION |) | |
| |) | |
| |) | |
| v. |) | |
| |) | No. 21-cv-11938-DPW |
| VINCENZO CARNOVALE, |) | |
| Defendant |) | |
| |) | |
| _____ |) | |

**ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO
COMPLAINT TO JUNE 23, 2022**

Now comes the defendant Vincenzo Carnovale, by and through undersigned counsel, and hereby respectfully requests this Honorable Court, with the SEC's assent, to extend the date by which to answer or otherwise respond to the Complaint in this matter by 45 days to June 23, 2022. As grounds and reasons therefore, the defense states that additional time will allow counsel, who is commencing a federal criminal trial on April 19 before this Honorable Court (*United States v. Dequattro*, Dkt. 20-cr-10271-DPW), the time to review the case with a client who resides in Canada but who waived service to facilitate the commencement of the case and to determine whether a discussion of settlement is in the client's interest or instead whether a particularized motion to dismiss is appropriate

WHEREFORE, the defense respectfully requests that the instant motion be allowed.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel conferred with counsel for the SEC, who, by and through David D'Addio, assents to this request.

Respectfully Submitted,

/s/ Martin G. Weinberg
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Dated: April 8, 2022

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, April 8, 2022, a copy of the foregoing documents has been served, via ECF, upon all registered participants.

/s/ Martin G. Weinberg
Martin G. Weinberg